

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

FILED

OCT 22 2019

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

THOMAS J. GRECO, JR., <u>Pro-Se</u>)	Case NO.: 1:09CR506
Defendant,)	JUDGE JOHN R. ADAMS
v.)	SUPPLEMENTAL MOTION TO REPLY TO
UNITED STATES OF AMERICA,)	GOVERNMENTS RESPONSE "IN
Plaintiff,)	OPPITISON TO REDUCE RESTITUTION."

On 2/17/11 Judge O'Malley approved Mr. Greco's Motion to Show Greco was Indigent with a Total Net Income of Negative -\$50,173. On April 5, 2011 Greco reported to FCI Morgantown for a 112 month sentence. Greco spent his family's entire savings of \$326,000 to prove his innocence. The Government charged Greco \$120,000 Forfeiture and took half or \$120,000 in a lien against his home. In 2013 the Government took Greco's entire back pension from 2009 to 2013 in an amount of \$146,000. The Government then garnished Greco's future monthly disability pension at 25%.

Mr. Greco enters a Supplemental Motion Pro Se to better explain his Financial Status to prove a reduction in his restitution. Mr. Greco has two sources of income. 1.) OPERS Pension of \$2,996.13 and 2.) CCH Pension of \$187.02. Total of Monthly Income \$3,183.15. After Federal and State Taxes Greco will receive Monthly \$2,642.01. The following is a listing of current expenses.

To date Mr. Greco has supplied to the Court approximately \$360,710.54 in Restitution Monies. Also this amount does not include the \$46,911 Greco had to pay on the untaxed monies from Greco's 2009-2013 Disability Pensions, \$22,000 in IRS Taxes and Interest and Court costs of \$1,300.

Financial Status of Income vs. Expenses.

\$2,642.01 Total Monthly Income for Thomas & Carmela Greco.

-\$442.95 Utilities. Electric, Gas, Water, Sewer, Phone.

-\$882.68 Home Expenses. Home Association Fee, Home Owners Insurance, Property Taxes, Home Upkeep and Repairs.

-\$1,258.60 Vehicle's. Car Insurances, Car Maintenance, Vehicle Gas, Vehicle License Plates and Renew Driver License,

-\$2,441.74 Medical. Carmela Medical Insurance, Prescriptions', Dental, Vision, Co-Pay and Payments of Overage of \$5,500 Deductable.

-\$2,032.67 Food & Other Expenses. Household Supplies, Tax Preparation, Postage, Clothing,

\$7,058.56 Total Monthly Expenses.

With the Income of \$2,642.01 Greco does not have monies to pay the \$7,058.56 expenses and is deficient in funds of \$4,416.55.

The \$7,058.56 does not include Attorney Fees, Funeral Expenses, Emergency Fund, or any Major Home Repairs.

The Government proposes to take 25% of the gross \$2,996.13 will be \$749.03 a month this will leave Greco with **\$1,892.98** to pay expenses of **\$7,058.56**. Mr. Greco asks this Honorable Court to approve his "Motion to reduce his Restitution."

United States Court House.

Attention "Clerk of Courts."

801 West Superior Ave.

Cleveland, Ohio 44113

Cc: Ms. Keysha Myers. U.S. Pretrial Services & Probation Officer.

Cc: Paul Miller. Financial Litigation Agent.

Cc: Alex Rokakis. Assistant U.S. Attorney.

Cc: Robert Patton. Assistant Attorney.

Thomas J. Greco, Jr.

July 28, 2019